

3 Barker Avenue, Third Floor
White Plains, New York 10601
(914) 437 7670 (tel)
(914) 437 7672 (fax)
jteitelbaum@tblawllp.com

42 West 38th Street, Suite 701
New York, New York 10018
(646) 233-3013

TEITELBAUM & BASKIN, LLP
Counselors at Law

April 16, 2010

BY ECF Filing and By Hand Delivery
Honorable Robert E. Gerber
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: In re Silvia Nuer 08-14106

Dear Judge Gerber:

We are counsel to JPMorgan Chase Bank, as servicer of loans and other assets of Washington Mutual Bank, N.A., as servicer for Deutsche Bank National Trust Co., as Trustee for the Long Beach Mortgage Trust 2006-2. We are writing this letter in response to the letter dated April 10, 2010 submitted by counsel for the Debtor in connection with Chase's March 31, 2010 request for a conference concerning the deposition of Mr. Ronaldo Reyes of Deutsche Bank.

To the extent the Court requests, Chase will respond in detail to counsel's unfounded claims and *ad hominem* attacks, but will not burden the Court with these matters herein.

Chase has provided the entire Reyes transcript to the Court and to the parties. Chase relies upon the transcript, rather than any characterizations thereof, to demonstrate that the conduct of Debtor's counsel violated this Court's March 18 ruling and that the undersigned's (i) direction to the witness not to answer certain questions; (ii) suspension of the deposition; and (iii) immediate filing of a letter with this Court seeking an order terminating the deposition, was appropriate and in accordance with this Court's March 18 ruling as to the scope of the Debtor's discovery and with Bankruptcy Rule 7030 (c)(2) and (d)(3).

Finally, Chase objects to counsel's request for appointment of a special master on the ground that such request is not only not supported by any facts, but is directly contrary to Bankruptcy Rule 9031, which provides that Fed. R. Civ. P. 53 (the appointment of special masters) does not apply in bankruptcy cases.

Respectfully,

/s/ Jay Teitelbaum
Jay Teitelbaum

cc. Via Email
Greg Zipes, Esq.
Judy Siegel, Esq.

Counsel for the Debtor:
Linda M. Tirelli
April Charney
O Max Gardner
Nick Wooten
Mark Malone